

Exhibit A

		ABDC's July 1, 2020 Supp. Resp. to Order (Doc. 3344) - Questions (i) - (vii)							Plaintiffs' Response, July 10, 2020
MTC Doc. #	Bates (range provided if family)	(i) date doc created	(ii) when doc produced in MDL	(iii) produced in other case prior to MDL	(iv) Category One (per ABDC)	(v) ABDC reason doc not produced in CT1	(vi) CT1 Custodial File	(vii) hit search terms	Plaintiffs' Response
1	ABDCMDL00569571	4/22/2011	post-CT1	Yes	No - Re Fla. Legislation	Category Two	Yes	Yes	ABDC is wrong. This is a Category One document ("regulatory activity").
2	ABDCMDL00571243	2/24/2012	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
3	ABDCMDL00569575	4/25/2011	post-CT1	Yes	No - Re Fla. Legislation	Category Two	Yes	Yes	ABDC is wrong. This is a Category One document ("advocacy group" [HDMA]).
4	ABDCMDL00551507	2/6/2012	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice).
5	ABDCMDL00568921	8/24/2007	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
6	ABDCMDL00573788	8/13/2015	post-CT1	Yes	ABDC did not answer	No search terms	Yes	No	Plaintiffs' agree the document does not hit search terms; however, the document should have been produced as highly relevant (contradictory to Defendants' positions in this MDL).
7	ABDCMDL00570832	1/10/2014	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no attorney; no legal advice).
8	ABDCMDL00571804	8/18/2017	post-CT1	Yes	ABDC did not answer	No search terms	Yes	No	Plaintiffs' agree the document does not hit search terms; however, the document should have been produced as highly relevant (contradictory to Defendants' positions in this MDL).
9	ABDCMDL00515292	1/23/2018	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
10	ABDCMDL00566109	5/27/2018	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.

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1	ABDCMDL00570277	2/13/2013	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
2	ABDCMDL05796118	3/2/2012	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice; attorney merely cc'd).
3	ABDCMDL05864639	9/22/2015	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP Nos. 21 & 23.
4	ABDCMDL00569293	10/20/2017	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
5	ABDCMDL06208729	10/31/2017	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP Nos. 21 & 23.
6	ABDCMDL06666405	10/9/2018	post-CT1	Yes	Yes	Document created after 5/29/2018	Yes	Yes	Document created prior to fact-discovery cut-off. Federal rules require supplemental production.
7	ABDCMDL06666406	10/9/2018	post-CT1	Yes	Yes	Document created after 5/29/2018	Yes	Yes	Document created prior to fact-discovery cut-off. Federal rules require supplemental production.
8	ABDCMDL05843263	10/29/2013	post-CT1	Yes	ABDC did not answer	Does not hit search terms	Yes	No	Plaintiffs' agree. Document does not hit search terms.
9	ABDCMDL05844460	1/14/2014	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP Nos. 8.
10	ABDCMDL07390208-0211	2/16/2009	post-CT1	Yes	n/a; related to non-CT1 customers	Does not hit search terms	Yes	No	Plaintiffs' agree. Document does not hit search terms.
11	ABDCMDL05858088-8091	1/13/2014	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice).
12	ABDCMDL06597117	3/2/2016	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (third party involvement; no legal advice).
13	ABDCMDL05864933	10/27/2015	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice).

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14	ABDCMDL05864935	10/27/2015	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (public article).
15	ABDCMDL05845467	3/23/2014	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice; attorney merely cc'd).
16	ABDCMDL00568949	10/17/2008	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
17	ABDCMDL06535228	2/22/2017	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
18	ABDCMDL05860108	6/24/2014	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice; attorney merely cc'd).
19	ABDCMDL00568928	9/24/2015	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
20	ABDCMDL00568794	6/19/2007	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
21	ABDCMDL00568946	9/20/2017	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
22	ABDCMDL00566401	5/27/2018	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP Nos. 8 & 23.
23	ABDCMDL00568700	1/16/2012	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
24	ABDCMDL00568701	1/16/2012	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
25	ABDCMDL00521255	8/13/2013	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
26	ABDCMDL00521520	8/11/2014	post-CT1	Yes	ABDC did not answer	Does not hit search terms	Yes	No	Plaintiffs' agree. Document does not hit search terms.
27	ABDCMDL00542407	2/15/2013	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).

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Reply Doc. #	Bates (range provided if family)	(i) date doc created	(ii) when doc produced in MDL	(iii) produced in other case prior to MDL	(iv) Category One (per ABDC)	(v) ABDC reason doc not produced in CT1	(vi) CT1 Custodial File	(vii) hit search terms	Plaintiffs' Response
28	ABDCMDL00542409	2/15/2013	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
29	ABDCMDL00542088	10/27/2016	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
30	ABDCMDL00552221	8/13/2013	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no attorney; no legal advice).
31	ABDCMDL00544779	10/27/2016	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
32	ABDCMDL00550144	12/26/2017	post-CT1	Yes	No - Outside geographic scope	Category Two	Yes	Yes	ABDC is wrong. This is a Category One document ("distribution monitoring" and/or "diversion" [order monitoring]).
33	ABDCMDL00549946	4/9/2012	post-CT1	Yes	No - Outside geographic scope	Category Two	Yes	Yes	ABDC is wrong. This is a Category One document ("distribution monitoring" and/or "diversion" and/or "regulatory activity" [order monitoring & DEA ISO to Cardinal]).
34	ABDCMDL00568712	5/23/2012	post-CT1	Yes	No - cover email outside geographic scope	Category Two	Yes	Yes	ABDC is wrong. This is a Category One document ("distribution monitoring" and/or "diversion", et al. [customer thresholds, ABDC OMP thresholds]).
35	ABDCMDL00554260-4263	5/7/2013	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
36	ABDCMDL00551575-1548	6/14/2012	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
37	ABDCMDL00550515	1/23/2018	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice; attorney merely cc'd).
38	ABDCMDL05783029	3/15/2012	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
39	ABDCMDL05921938	10/22/2014	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.

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40	ABDCMDL05784660	1/14/2018	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP No. 11.
41	ABDCMDL05778656	3/3/2011	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
42	ABDCMDL05778657	3/3/2011	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
43	ABDCMDL05778662	3/3/2011	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
44	ABDCMDL00580140	5/25/2018	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
45	ABDCMDL00570517	6/22/2016	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP No. 23.
46	ABDCMDL05781234	3/6/2012	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
47	ABDCMDL05779938	2/21/2012	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP No. 23.
48	ABDCMDL05777517	11/15/2011	post-CT1	Yes	n/a - relates to specific FL customers	Does not hit search terms	Yes	No	Plaintiffs' agree. Document does not hit search terms.
49	ABDCMDL05796115	3/2/2012	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (third party involvement; no legal advice).
50	ABDCMDL05793926	6/18/2014	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
51	ABDCMDL05789381	5/27/2018	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice).
52	ABDCMDL05791245	5/29/2007	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).

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53	ABDCMDL05829763	3/13/2017	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice).
54	ABDCMDL05847672	7/8/2014	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice; attorney merely cc'd).
55	ABDCMDL05850621	10/22/2014	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
56	ABDCMDL05846812	5/29/2014	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice; third party involvement).
57	ABDCMDL05829847	3/14/2017	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice; large distribution).
58	ABDCMDL05819913	8/5/2015	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP Nos. 11 & 23.
59	ABDCMDL05797902	5/25/2018	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP Nos. 23, 28 & 29.
60	ABDCMDL05831172-1175	5/19/2017	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice).
61	ABDCMDL05859392	4/10/2014	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice; third party involvement).
62	ABDCMDL05919654	8/4/2017	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP No. 23.
63	ABDCMDL06171523	7/26/2012	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
64	ABDCMDL06209133	9/28/2017	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (third party involvement).

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65	ABDCMDL06433723-3725	12/20/2017	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
66	ABDCMDL06965500	10/26/2016	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
67	ABDCMDL06965501	10/26/2016	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
68	ABDCMDL06965502	10/26/2016	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
69	ABDCMDL06965505	10/26/2016	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
70	ABDCMDL06964817	9/9/2011	post-CT1	Yes	Yes	Withheld as privileged	No	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice). ABDC claims this is from the custodial file of "Paul Ross." This document is an email from/to numerous CT1 custodians, namely, Gundy, Bruce; Hazewski, Edward; Mays, Steve; Zimmerman, Chris.
71	ABDCMDL06149436	2/4/2012	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
72	ABDCMDL06962871	5/8/2018	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice; no attorney).
73	ABDCMDL06159883	2/13/2013	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
74	ABDCMDL00569405	10/13/2017	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP Nos. 11 & 16.
75	ABDCMDL00569249	10/31/2017	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).

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76	ABDCMDL00569615	2/14/2011	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice; third party involvement).
77	ABDCMDL00569618	2/15/2011	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP No. 23.
78	ABDCMDL00569619	2/15/2011	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP No. 23.
79	ABDCMDL00569620	2/15/2011	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP No. 23.
80	ABDCMDL00569622	2/15/2011	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP No. 23.
81	ABDCMDL00569623	2/15/2011	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP No. 23.
82	ABDCMDL00569592	12/1/2011	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
83	ABDCMDL00569593	12/1/2011	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
84	ABDCMDL00524989	4/3/2013	post-CT1	Yes	No - Outside geographic scope	Category Two	Yes	Yes	ABDC is wrong. This is a Category One document ("distribution monitoring"). Also hits on search terms using CT1 Customer Block.
85	ABDCMDL00544025	2/27/2014	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).
86	ABDCMDL00571208	2/7/2012	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
87	ABDCMDL00570215-0225	4/24/2013	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
88	ABDCMDL00580120	8/1/2017	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
89	ABDCMDL05815235	9/11/2015	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.

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90	ABDCMDL05788612	5/27/2018	post-CT1	Yes	ABDC did not answer	Not responsive	Yes	Yes	ABDC is wrong. Document is responsive to RFP No. 23.
91	ABDCMDL00620433	11/21/2017	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
92	ABDCMDL06968414	11/4/2017	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade.
93	ABDCMDL06968421	11/4/2017	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade.
94	ABDCMDL06968423	11/4/2017	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade.
95	ABDCMDL03831797	8/11/2018	post-CT1	Yes	Yes	Withheld as privileged	Yes	Yes	Delinquent privilege downgrade. Also, invalid original privilege designation (no legal advice).
96	ABDCMDL00552327-2329	8/11/2014	post-CT1	Yes	ABDC did not answer	Does not hit search terms	Yes	No	Plaintiffs' agree. Document does not hit search terms.
97	ABDCMDL06273793	3/21/2013	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
98	ABDCMDL05788026	5/28/2018	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
99	ABDCMDL05793857	1/29/2014	post-CT1	Yes	Yes	Erroneously not produced	Yes	Yes	Document inexcusably removed from Track One production.
100	ABDCMDL00542090	10/27/2016	post-CT1	Yes	Yes	Dupe or Near Dupe/Similar	Yes	Yes	Production required pursuant to CMO #3 (Document and ESI Protocol).

Exhibit A Statistical Summary - Responses to Court's Questions re: 110 Sample Documents

	(i) Date the document was created (created prior to close of CT1 discovery?)	(ii) Date the document was produced in the MDL (post-CT1?)	(iii) Date the document disclosed in other proceedings (prior to disclosure in MDL?)	(iv) Whether the document falls within Category One	(v) Why the document was not produced in Track One	(vi) Whether the document is in the custodial file of a witness deposed in CT1	(vii) Whether the document included agreed search terms
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